

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

EVAN BRIAN CROCKER on behalf of
himself and all those similarly situated,

Plaintiff,

NAVIENT SOLUTIONS, LLC,
NAVIENT CREDIT FINANCE
CORPORATION,

Defendants.

Case Number 15-35586 (DRJ)

Chapter 7

Adv. Pro. No. 16-03175 (DRJ)

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARD**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

EXPEDITED RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EXPEDITED BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF, OR IF YOU BELIEVE THAT EXPEDITED CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

PER DOCKET NO. 355, THE COURT ORDERED THE FINAL APPROVAL HEARING TO TAKE PLACE ON DECEMBER 1, 2021, AND THIS MOTION TO BE FILED FOURTEEN DAYS PRIOR TO THE HEARING, OR ON NOVEMBER 17, 2021

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY

Class Counsel for Plaintiff Evan Brian Crocker (“Crocker”), on behalf of himself and all others similarly situated (collectively, “Plaintiffs”), respectfully submit this Motion for Attorneys’ Fees, Expenses and Class Representative Service Fee pursuant to Fed. R. Civ. P. 23(h).

For the reasons set forth in the accompanying Memorandum of Law in Support, Class Counsel respectfully move this Court for an Order awarding Class Counsel legal fees of \$3.65 million, as well as reimbursement of \$413,427.21 in costs and a \$15,000 Class Representative service award, in conjunction with the proposed Settlement Agreement with Defendants Navient Solutions, LLC and Navient Credit Finance Corporation (collectively, “Navient” or “Defendants”).

Dated: November 17, 2021.

Respectfully submitted,

By: /s/ Jason W. Burge
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of November, 2021, a true and correct copy of the above pleading was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned proceeding.

/s/ Jason W. Burge
Jason W. Burge